

# State of California



## Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 • • • 1100 K STREET BUILDING, SACRAMENTO, 95814

Technical Assistance • • Administration • • Executive/Legal • • Enforcement  
(916) 322-5662 322-5660 322-5901 322-6441

July 22, 1985

Richard W. Lofsted  
Recording & Financial Secretary  
Amalgamated Transit Union, Local 265  
843 The Alameda  
San Jose, CA 95126

Re: Your Request for Advice  
Our File No. A-85-152

Dear Mr. Lofsted:

I am in receipt of your request for advice on the propriety of your union's political action committee making a contribution to the Santa Cruz chapter of the Veterans of Foreign Wars. You have stated that such a contribution involves "no political candidates and no ballot measures" and "has nothing to do with elections." The Political Reform Act of 1974 (Government Code Sections 81000 to 91015) does not regulate this subject except to require proper accounting and reporting of any such payments. However, there are provisions in the Elections Code (Sections 12400 to 12407) which govern the proper use of campaign funds, "including funds of political action committees." For an interpretation of these provisions, you should direct your inquiry to the Office of the Attorney General.

In response to your request I am enclosing a copy of our current guide for Treasurers of Campaign Committees. Should you have further questions regarding this letter, please contact me at (916) 322-5901.

Sincerely,

A handwritten signature in cursive script that reads "Robert E. Leidigh".

Robert E. Leidigh  
Counsel  
Legal Division

REL:plh  
Enclosure



AFL-CIO

# AMALGAMATED TRANSIT UNION

## LOCAL 265

843 The Alameda  
SAN JOSE, CALIFORNIA 95126

(408) 998-4722



July 9, 1985



1902 Charter Seal

Barbara Milman  
Fair Political Practices Commission  
P.O. Box 807  
Sacramento, California 95804

Dear Ms. Milman,

This is a request for informal advice on behalf of Amalgamated Transit Union Local 265 Political Action Committee (I.D. 841330), of which I am treasurer.

The Executive Board of our local wishes to provide financial assistance to the Santa Cruz chapter of the Veterans of Foreign Wars, to help mitigate the financial losses it has suffered while attempting to defend its constitutional right to freedom of expression. Our Board has asked me to find out if it is proper to use P.A.C. monies for this purpose.

No political candidates and no ballot measures are involved, and this has nothing to do with elections. Unfortunately, I am unable to retrieve my copy of the original PAC guidelines sent to me when our committee was formed; otherwise I would have referred directly to those guidelines. In addition to your written response, please send me another copy of the guidelines, if it is proper for your office to do so.

Thanking you in advance, I am

Sincerely,

RICHARD W. LOFSTED  
Recording & Financial Secretary